

1 FARHAN R. NAQVI
Nevada Bar No. 8589
2 ELIZABETH E. COLEMAN
Nevada Bar No. 12350
3 NAQVI INJURY LAW
9500 W Flamingo Road, Suite 104
4 Las Vegas, Nevada 89147
5 Telephone: (702) 553-1000
Facsimile: (702) 553-1002
6 naqvi@naqvilaw.com
elizabeth@naqvilaw.com
7 *Attorneys for Plaintiff*

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10 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

11 SLOBODANKA DJORDJEVIC-MIKIC,
individually,

12
13 Plaintiff,

14 vs.

15 PRIVILEGE UNDERWRITERS
16 RECIPROCAL EXCHANGE a/k/a PURE;
DOES I through X and ROE
17 CORPORATIONS I through X, inclusive,

18 Defendants.

Case No.: 2:17-cv-02667-JCM-CWH

**STIPULATION AND ORDER TO
EXTEND DISCOVERY**

(FIRST REQUEST)

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20 Plaintiff, SLOBODANKA DJORDJEVIC-MIKIC, by and through her counsel of record,
21 NAQVI INJURY LAW, and Defendant PRIVILEGE UNDERWRITES RECIPROCAL
22 EXCHANGE a/k/a PURE, by and through its counsel of record, TYSON & MENDES LLP,
23 submit this **STIPULATION AND ORDER TO EXTEND DISCOVERY (FIRST REQUEST)**
24 pursuant Rules 6(b) and 26(f) of the Federal Rules of Civil Procedure and Local Rules 6-1 and
25 26-4 for the Court's consideration:
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I.

DISCOVERY COMPLETED TO DATE

1. A 26(f) Conference was held and a Discovery Plan and Scheduling Order was filed.
2. Plaintiff has made initial disclosures as well as a supplement thereto.
3. Defendant has made initial disclosures.
4. Plaintiff has propounded a first set of request for production upon Defendant.
5. Defendant has responded to Plaintiff's first set of request for production.
6. Plaintiff has propounded a first set of interrogatories upon Defendant.
7. Defendant has responded to Plaintiff's first set of interrogatories.
8. Plaintiff has propounded a first set of request for admissions upon Defendant.
9. Defendant has responded to Plaintiff's first set of request for admissions.
10. Defendant has propounded a first set of request for production upon Plaintiff.
11. Plaintiff has responded to Defendant's first set of request for production.

II.

DISCOVERY TO BE COMPLETED

1. Expert retention and disclosures;
2. The deposition of the 30(b)(6) designee for Defendant;
3. Depositions of various witnesses including, but not limited to:
 - a. Plaintiff;
 - b. Plaintiff's treating physicians;
 - c. Experts;
 - d. Other witnesses;
4. Production of additional records related to Plaintiff's medical treatment;

5. Additional written discovery; and
6. Any other discovery which may be determined relevant and necessary.

III.

WHY DISCOVERY CANNOT BE COMPLETED IN THE TIME PROVIDED BY THE SCHEDULING ORDER

Good cause exists in this case to grant a discovery extension. Plaintiff – who asserts a brain and other injuries in this case – has recently produced diagnostic brain scans to Defendant for expert review. As such, additional time is needed to thoroughly evaluate the scans, as well as all other relevant medical records, before expert disclosures are made. Likewise, Defendant has recently disclosed hundreds of pages of records, including the claims file, which are necessary for evaluation prior to expert disclosure and retention.

In addition to the foregoing, an extension of the discovery deadlines is necessary as the parties are working together to arrange depositions. Specifically, the deposition of Defendant's 30(b)(6) designee, which the parties are currently working to arrange, must be taken prior to the initial expert disclosure so that the experts can review the transcript from said deposition prior to completing their reports. Therefore, the parties request that the discovery deadlines be extended as indicated below:

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IV.

PROPOSED SCHEDULE FOR COMPLETING REMAINING DISCOVERY

DISCOVERY	PROPOSED DEADLINE
Motion to Amend Pleadings:	Closed
Initial Expert Disclosures	July 16, 2018
Rebuttal Expert Disclosures:	August 15, 2018
Close of Discovery	September 14, 2018
Dispositive Motions:	October 15, 2018
Interim Status Report	July 16, 2018
Joint Pre-Trial Order:	November 14, 2018

Dated this 27th day of April, 2018.

Dated this 27th day of April, 2018.

NAQVI INJURY LAW

TYSON & MENDES LLP

/s/ Elizabeth Coleman

/s/ Carrie McCrea Hanlon

FARHAN R. NAQVI
Nevada Bar No. 8589
ELIZABETH E. COLEMAN
Nevada Bar No. 12350
9500 W Flamingo Road, Suite 104
Las Vegas, Nevada 89147
Attorneys for Plaintiff

THOMAS E. MCGRATH
Nevada Bar No. 7086
CARRIE MCCREA HANLON
Nevada bar No. 3902
3960 Howard Hughes Pkwy., Suite 600
Las Vegas, Nevada 89169
Attorneys for Defendant

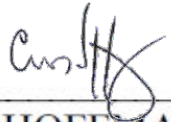
IT IS SO ORDERED.

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DATED: May 1, 2018

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C.W. HOFFMAN, JR.
UNITED STATES MAGISTRATE JUDGE

ORDER

IT IS SO ORDERED this _____ day of _____, 2018.

United States District Court Judge

Respectfully Submitted By:

NAQVI INJURY LAW

/s/ Elizabeth Coleman

FARHAN R. NAQVI

Nevada Bar No. 8589

ELIZABETH E. COLEMAN

Nevada Bar No. 12350

9500 W Flamingo Road, Suite 104

Las Vegas, Nevada 89147

Attorneys for Plaintiff

